

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

PAIGE CARTER, Special Administrator of
the ESTATE OF KEVIN C.
CARTER, Deceased,

Plaintiff,

vs.

SCOTT FRAKES, et al.,

Defendants.

Case No. 8:23-cv-485

**STIPULATED MOTION TO EXTEND
DEADLINE TO DISMISS**

COME NOW the Plaintiff and Defendants, through undersigned counsel, and hereby request an extension of the deadline to submit dismissal documents, as follows:

1. On April 14, 2025, following notification of the parties' settlement, the Court issued an Order (Filing 78) requiring the parties to file a Joint Stipulation for Dismissal on or by May 14, 2025.

2. There is good cause to extend the May 14 deadline; specifically, the State requires additional time to complete full performance of the terms of the settlement.

3. The parties request that the deadline be extended to July 1, 2025, which should be sufficient time to complete performance by the State.

WHEREFORE, the parties request the Court grant an extension of the deadline to submit a stipulated dismissal or other dispositive document to July 1, 2025, and for such other and further relief as the Court deems just and equitable.

Dated this 12th day of May, 2025.

By: s/ Rodney C. Dahlquist, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2025, I have electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the parties of record.

s/ Rodney C. Dahlquist, Jr.

Rodney C. Dahlquist, Jr., #23912

Attorney for Plaintiff